

1 Joshua D Buck
Leah Lin Jones
2 Mark R. Thierman
Thierman Buck, LLP
3 7287 Lakeside Drive
4 Reno, NV 89511
775-284-1500
5 Email: josh@thiermanbuck.com
Email: leah@thiermanbuck.com
6 Email: laborlawyer@pacbell.net

7 Nicholas Wyckoff Woodfield
8 The EmploymentLaw Group, PC
888 17th St. NW
9 9th Floor
Washington, DC 20006
10 202-261-2812
11 Email: nwoodfield@employmentlawgroup.com

12 Attorneys for Plaintiff
KARL HANSEN

13 [COUNSEL CONTINUED ON NEXT PAGE]
14

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 KARL HANSEN,
18 Plaintiff,
vs.
19 ELON MUSK; TESLA, INC.; TELS
20 MOTORS, INC.; U.S. SECURITY
ASSOCIATES; DOES 1 THROUGH 50,
21 Defendants.
22

Case No. 3-19-cv-00413-LRH-WGC

**FIRST STIPULATION TO EXTEND
PRETRIAL DEADLINES**

23
24 ///

25 ///

26 ///

27 ///

28 ///

FIRST STIPULATION TO EXTEND PRETRIAL
DEADLINES

1 Crane M. Pomerantz
Nevada Bar No. 14103
2 SKLAR WILLIAMS, PLLC
410 South Rampart Boulevard, Suite 350
3 Las Vegas, Nevada 89145
4 Email: cpomerantz@sklar-law.com
Tel: (702) 360-6000
5 Fax: (702) 360-0000

6 Christopher F. Robertson
Bar No. 642094
7 Email: crobertson@seyfarth.com

8 Anne V. Dunne
Bar No. 681893
9 Email: adunne@seyfarth.com

SEYFARTH SHAW LLP
10 World Trade Center East Two Seaport Lane, Suite 300
Boston, Massachusetts 02210-2028
11 Telephone: (617) 946-4800
12 Facsimile: (617) 946-4801

13 Attorneys for Defendants
ELON MUSK, TESLA, INC., and TESLA MOTORS, INC.
14

15 Matthew T. Cecil
Nevada State Bar No. 9525
16 HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
17 Las Vegas, NV 89134
Tel: (702) 669-4600
18 Fax: (702) 669-4650
19 Email: MTCecil@hollandhart.com

20 S. Jordan Walsh
Nevada State Bar No.
21 Dora V. Lane
Nevada State Bar No.
22 HOLLAND & HART LLP
5441 Kietzke Lane, Suite 200
23 Reno, NV 89511
24 Tel: (775) 327-3000
Fax: (775) 786-6179 (fax)
25 Email: sjwalsh@hollandhart.com
26 dlane@hollandhart.com

27 ///

///

28 ///

FIRST STIPULATION TO EXTEND PRETRIAL
DEADLINES

1 ///

2 Jeremy T. Naftel
 3 California State Bar No. 185215
 4 Janine M. Braxton
 5 California State Bar No. 296321
 6 Alex A. Smith
 7 California State Bar No. 317224
 8 MARTENSON, HASBROUCK & SIMON LLP
 455 Capitol Mall, Suite 601
 9 Sacramento, California 95814
 10 Email: jnaftel@martensonlaw.com
 11 jbraxton@martensonlaw.com
 12 alexsmith@martensonlaw.com

13 Attorneys for Defendant
 14 U.S. SECURITY ASSOCIATES

15 Pursuant to LR IA 6 of the Local Rules of Practice for the District Court for the District of
 16 Nevada, Plaintiff Karl Hansen and Defendants Elon Musk (“Musk”), Tesla, Inc., Tesla Motors, Inc.
 17 (collectively the “Tesla Parties”), and U.S. Security Associates (“USSA”) (collectively “Parties”) by
 18 and through their respective counsel, jointly stipulate and move this Court to extend the remaining
 19 deadlines set forth in the Court’s Order of December 10, 2019 (Docket Entry “D.E.” 27) in light of
 20 the following:

21 On February 27, 2020, the Tesla Parties filed a motion to compel arbitration. (D.E. 39.) On
 22 March 10, 2020, Plaintiff filed an opposition to the Tesla Parties’ motion to compel arbitration. (D.E.
 23 40.) On March 17, 2020, the Tesla Parties filed a reply in support of their motion to compel
 24 arbitration. (D.E. 41.) This Court’s ruling on the motion to compel may potentially change the scope
 25 and procedural posture of this matter.

26 On March 12, 2020, Governor Sisolak declared a state of emergency for Nevada in response
 27 to the novel coronavirus disease outbreak. One day later, on March 13, 2020, President Donald
 28 Trump issued a proclamation on declaring a national emergency concerning the novel coronavirus
 disease (COVID-19) outbreak. In light of the COVID-19 outbreak, the Parties and their respective
 counsel are unable to travel to take depositions, and various offices are closed pending further notice.

WHEREFORE, the Parties hereby jointly stipulate and respectfully move this Court to enter an Order extending the remaining deadlines set forth in its December 10, 2019 Order as follows:

Deadline Plaintiff's disclosure of expert testimony:	May 25, 2020
Deadline: Defendant's disclosure of expert testimony:	June 26, 2020
Deadline: Discovery cut-off:	July 25, 2020
Deadline: Dispositive Motions:	August 24, 2020
Deadline: Joint Pre-trial Order:	September 22, 2020

Jointly and respectfully submitted:

Dated: March 20, 2020 THE EMPLOYMENT LAW GROUP

/s/

Nicholas Woodfield

Mark R. Thierman
Thierman Buck, LLP
7287 Lakeside Drive
Reno, NV 89511

Attorneys for Plaintiff Karl Hansen

Date: March 20, 2020 SEYFARTH SHAW LLP

/s/

Christopher F. Robertson, Esq.

Crane M. Pomerantz
SKLAR WILLIAMS, PLLC
410 S. Rampart Blvd., Suite 350
Las Vegas, NV 89145

*Attorneys for Elon Musk, Tesla, Inc., and
Tesla Motors, Inc.*

1 Date: March 20, 2020

MARTENSON, HASBROUCK & SIMON LLP

2
3 /s/
Jeremy T. Naftel

4 Matthew T. Cecil
5 HOLLAND AND HART, LLP
6 9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

7 *Attorneys for U.S. Security Associates*

8 IT IS SO ORDERED:
9

10 DATED: _____

11 _____
12 UNITED STATES DISTRICT JUDGE,
13 UNITED STATES MAGISTRATE JUDGE,
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28